

**THE CITY OF NEW YORK  
LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, N.Y. 10007

**HON. SYLVIA O. HINDS-RADIX**  
Corporation Counsel

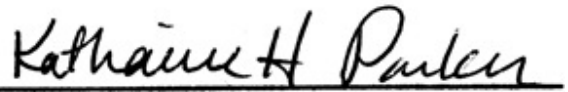
**Michael Viviano**  
Assistant Corporation Counsel  
Tel.: (212) 356-2368  
mviviano@law.nyc.gov

March 24, 2022

**VIA ECF**

Honorable Katherine H. Parker  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street.  
New York, NY 10007

**APPLICATION GRANTED**

  
**Hon. Katharine H. Parker, U.S.M.J.**

03/25/2022

Re: DeLuca, et. al. v. City of New York., et al., 21-CV-10777 (AJN)-(KHP)

Your Honor:

I am an Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants in the above-referenced matter. Defendants write respectfully to request a five day enlargement of time, from March 24, 2022 to March 29, 2022 for the parties to make the filings this Court requires in advance of the March 30, 2020 initial pretrial conference. The parties have conferred consistent with Fed.R.Civ.P. 26(f), Your Honor's Individual Rules of Practice, and Your Honor's March 14, 2022 Order (Dkt. 18). However, the parties have two disputes which, in accordance with Your Honor's rules, need to be put before the Court before the conference. This afternoon, plaintiffs provided their position on those disputes, which references the discovery in separate litigation in this district, *In re New York City Policing During Summer 2020 Demonstrations*, 20-cv-8924 (SM)(GWC).<sup>1</sup> In order to adequately respond to plaintiffs' position, I am requesting an additional three business days, until Tuesday March 29, 2022. Defendants have made one previous request for an adjournment of the filing of the joint letter required prior to the initial pretrial conference. This request is made with plaintiff's consent.

<sup>1</sup> Plaintiffs' counsel is also counsel of record for some of the plaintiffs in that matter.

Thank you for your consideration herein.

Respectfully submitted,

Michael Viviano /s/

*Assistant Corporation Counsel*  
Michael Viviano

cc: Gideon O. Oliver, Esq. (VIA ECF)